

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

UNITED STATES OF AMERICA §
v. § No. 4:21CR300
§ Judge Jordan
MATTHEW CURTIS ANDERSON (3) §

FACTUAL BASIS

The defendant, **Matthew Curtis Anderson**, hereby stipulates and agrees that at all times relevant to the **Fifth Superseding Indictment** herein, the following facts were true:

1. That the defendant, **Matthew Curtis Anderson**, who is changing his plea to guilty, is the same person charged in the **Fifth Superseding Indictment**.
 2. That **Matthew Curtis Anderson** and one or more persons in some way or manner made an agreement to commit the crime charged in the **Fifth Superseding Indictment**, to possess with the intent to manufacture and distribute at least 3 kilograms but less than 10 kilograms of a mixture containing a detectable amount of heroin.
 3. That **Matthew Curtis Anderson** knew the unlawful purpose of the agreement and joined in it with the intent to further it.
 4. That **Matthew Curtis Anderson** knew that the amount involved during the term of the conspiracy involved. This amount was involved in the conspiracy after the defendant entered the conspiracy, was reasonably foreseeable to the defendant and was part of jointly undertaken activity.

5. **Matthew Curtis Anderson** possessed a firearm during the course of the conspiracy.

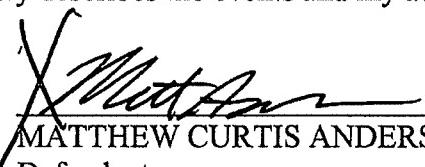
6. **Matthew Curtis Anderson** misrepresented as another substance a mixture or substance containing fentanyl which resulted in the death of M.G. on or about October 29, 2021.

DEFENDANT'S SIGNATURE AND ACKNOWLEDGMENT

I have read this Factual Basis and the **Fifth Superseding Indictment** and have discussed them with my attorney. I fully understand the contents of this Factual Basis and agree without reservation that it accurately describes the events and my acts.

Dated:

12/23/24


MATTHEW CURTIS ANDERSON
Defendant

COUNSEL FOR DEFENDANT'S SIGNATURE AND ACKNOWLEDGMENT

I have read this Factual Basis and the **Fifth Superseding Indictment** and have reviewed them with my client. Based upon my discussions with the defendant, I am satisfied that the defendant understands the Factual Basis and the **Fifth Superseding Indictment**.

Dated:

12/23/24


SANJAY BISWAS
Attorney for the Defendant